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January 8, 2025

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**VIA ELECTRONIC DELIVERY AND COURT FILING**

The Honorable Katharine H. Parker  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 750  
New York, New York 10007

**Re: United States v. Anthem, Inc., 1:20-cv-02593-ALC-KHP**

Dear Judge Parker:

Pursuant to the Court's December 9, 2024 Order (Dkt. 278), the parties jointly submit a proposed agenda for the case management conference scheduled for January 15, 2025.<sup>1</sup>

**Agenda for January 15, 2025 Conference**

I. Discovery Update

- a. The parties are proceeding under the discovery schedule outlined in the Court's December 17, 2024 Order (Dkt. 280) and are continuing to meet and confer regarding outstanding disputes related to pending discovery requests.
- b. The parties would like to provide the Court with an update on their efforts to resolve the issue of large families of documents present in the *Poehling* productions.

II. Discovery Disputes

- a. Anthem's search in response to Request No. 2 of the Government's Fourth Set of Requests for Production.
- b. The scope of Anthem's response to Request Nos. 3 and 4 of the Government's Fourth Set of Requests for Production.

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<sup>1</sup> K. Lee Blalack, lead counsel for Anthem, respectfully notifies the Court that he will be unable to attend the January 15, 2025 conference due to a recent court order scheduling a hearing in another matter in the Northern District of California in which he is serving as lead counsel. The court's order requires attendance by lead counsel. After consultations, Anthem is prepared to proceed with the January 15 case management conference through representation by its other counsel that have entered an appearance on its behalf in this matter.

- c. The Government's productions of documents responsive to Anthem's First Set of Requests for Production Nos. 15, 16, 27, 28, 29 and 30.

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The parties previously jointly requested that the Court reschedule the December case management conference and permit the parties to file position statements of no more than four pages addressing any discovery disputes in advance of the conference (Dkt. 273). The Court granted that letter motion by minute order, adjourning the December case management conference and directing the parties to file their position statements on any discovery disputes concurrently with the parties' joint agenda for the January case management conference (*see* Dkt. 274). Consistent with the Court's Order, the parties are filing letters outlaying their respective positions on the above disputes simultaneously with this proposed agenda.

Dated: January 8, 2025

Respectfully submitted,

By: /s/ James A. Bowman

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